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June 10, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/ Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: James T. Simmons v. Duke Energy Carolinas, LLC**  
**Docket Number: 2021-95-E**

Dear Ms. Boyd:

Pursuant to S.C. Code Ann. Regs. 103-833, please find Duke Energy Carolinas, LLC's First Set of Interrogatories to Complainant, which were served on June 10, 2021.

By copy of this letter we are serving the same on the parties of record.

Sincerely,

Katie M. Brown

Enclosure

cc: James T. Simmons (via U.S. Mail and email)  
Alexander W. Knowles, Office of Regulatory Staff (via email)  
C. Lessie Hammonds, Office of Regulatory Staff (via email)  
Carri Grube Lybarker, Department of Consumer Affairs (via email)  
Roger P. Hall, Department of Consumer Affairs (via email)  
Heather Shirley Smith, Duke Energy Carolinas, LLC (via email)  
Rebecca J. Dulin, Duke Energy Carolinas, LLC (via email)

**DOCKET NO. 2021-95-E**

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2. Please sign and date the Certification that follows these Interrogatories.

Dated this 10th day of June, 2021.

s/ Katie M. Brown

Katie M. Brown, Counsel  
Duke Energy Carolinas, LLC  
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Greenville, SC 29601  
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Samuel J. Wellborn (SC Bar No. 101979)  
ROBINSON GRAY STEPP & LAFFITTE, LLC  
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*Attorneys for Duke Energy Carolinas, LLC*

## **INTERROGATORIES**

### **RESPONSE:**

- 1-1 Please describe the type of heating you use in your residence (e.g., gas furnace, oil furnace, electric furnace, boiler, heat pump, hybrid heating, radiant heating, baseboard heaters, etc.).

### **RESPONSE:**

- 1-2 Please provide the date(s) on which your heating device(s) were purchased and installed, and the date they were last serviced.

### **RESPONSE:**

- 1-3 Please describe the type of residence in which you live (e.g., single-family home, condominium, apartment, townhome, mobile home, manufactured home, etc.).

### **RESPONSE:**

- 1-4 Please describe the type of material used for the following elements of your residence:
- (a) Exterior walls (e.g., brick, wood, aluminum, etc.)
  - (b) Roof (e.g., asphalt shingles, cedar shingles, aluminum, etc.)
  - (c) Interior walls (e.g., drywall, plaster, vinyl, etc.)
  - (d) Flooring (e.g., vinyl, wood, tile, etc.)

### **RESPONSE:**

- 1-5 Please describe the type of insulation used, if any, in the following areas of your home:
- (a) Walls (e.g., no insulation, blown insulation, bat insulation, etc.)
  - (b) Above living space / attic (e.g., no insulation, blown insulation, bat insulation, etc.)
  - (c) Below living space / crawlspace (e.g., no insulation, blown insulation, bat insulation, etc.)
  - (d) Around HVAC ductwork
  - (e) Around water heater

### **RESPONSE:**

- 1-6 Please describe the type of windows used in your home (e.g., single-pane, double-pane, triple-pane, etc.) and when the windows were installed.

### **RESPONSE:**

- 1-7 Please list and describe any electric devices that are used in your home (e.g., water heater, electric heaters, pool pumps, etc.).

**RESPONSE:**

- 1-8 Please provide a detailed description of your electricity use throughout the year. Please include the following information:
- a) At what temperature do you set your thermostat during the summer?
  - b) At what temperature do you set your thermostat during the winter?
  - c) How often do you replace your HVAC air filters?
  - d) What temperature is your hot water heater set to throughout the year?

**RESPONSE:**

- 1-9 Do you use any energy efficient devices in your home including, but not limited to, the following?
- a) Energy efficient heat pump
  - b) Energy efficient electric strip
  - c) Smart thermostat
  - d) LED lighting
  - e) Energy usage monitor

**RESPONSE:**

- 1-10 Do you use gas or electricity for water heating?

**RESPONSE:**

- 1-11 Please provide the date of your last HVAC service, including having any ductwork inspected.

**RESPONSE:**

- 1-12 Please provide the number of people who reside in your home year-round, including any guests.

**RESPONSE:**

- 1-13 If any individuals reside in your home only during certain months (such as during the summer or winter months), please provide the number of such persons, and specify which months they reside in your home.

**RESPONSE:**

1-14 Please state whether you have requested and had completed a Home Energy House Call, an energy efficiency program offered by Duke Energy Carolinas, and if not, please provide the reason.

**RESPONSE:**

1-15 Please describe the location of your water heater (e.g., outside the house, inside an interior closet, etc.) and whether the water heater has a “blanket” or other insulation.

**RESPONSE:**

**CERTIFICATION**

I, James T. Simmons, state that the contents of these Responses to Interrogatories are true, accurate and correct to the best of my knowledge, information and belief. I certify that the foregoing statement made by me is true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

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(SIGNATURE)

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(DATE)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2021-95-E**

**IN RE:**

James T. Simmons,  
 Complainant,

v.

Duke Energy Carolinas, LLC,  
 Respondent

**CERTIFICATE OF SERVICE**

The undersigned, Lyndsay McNeely, Paralegal for Duke Energy Carolinas, LLC, does hereby certify that she has served the persons listed below with a copy of Duke Energy Carolinas, LLC's First Set of Interrogatories to Complainant in the above-captioned proceedings via electronic mail and U.S. Mail as specified below on June 10, 2021.

Alexander Knowles  
 Office of Regulatory Staff  
[aknowles@ors.sc.gov](mailto:aknowles@ors.sc.gov)

C. Lessie Hammonds  
 Office of Regulatory Staff  
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Samuel J. Wellborn  
 Robinson Gray Stepp & Laffitte, LLC  
[swellborn@robinsongray.com](mailto:swellborn@robinsongray.com)

Dated this 10th day of June, 2021.

  
 Lyndsay McNeely